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August 8, 2022


Via ECF

Application GRANTED.

Hon. P. Kevin Castel
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

SO ORDERED.

Dated: New York, NY
08/09/2022


P. Kevin Castel
United States District Judge

Re: *Miller et al. v. City of New York et al.*, 21 Civ. 2616 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the “City”), counsel for defendants in this matter. The date of the next scheduled conference before the Court in this matter is October 17, 2022.

I write to respectfully, request, with the consent of plaintiff’s counsel, a four day extension of time, from August 8, 2022 to August 12, 2022, for the parties to submit their proposal for electronic discovery pursuant to the Court’s Order of June 28, 2022 (ECF No. 59). The parties have conferred in accordance with the Court’s order, conducted depositions regarding the location and nature of relevant documents, and continue to work cooperatively and in good faith to formulate search terms and a list of custodians. The parties have reached agreement on most issues, but an additional four days is required to complete that process, in part because the City’s counsel has been heavily engaged in family medical matters relating to a child’s surgery that occurred on July 26, 2022, and the subsequent recovery. Defendants apologize for the last-minute nature of this request, which is due, in part, to information that came to defendants’ counsel’s attention today.

Accordingly, defendants respectfully request that the Court allow the parties until August 12, 2022, to submit their proposal for electronic discovery according to the requirements of the June 28, 2022 Order.

This is the second request for the extension of this deadline; the first request was granted upon consent.

We thank the Court for its consideration of this matter.

Sincerely,

Alan H. Scheiner /s/

Alan H. Scheiner

Senior Counsel

Special Federal Litigation Division

cc (via ECF): All counsel